

IN THE UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

METROPOLITAN ALLIANCE OF POLICE)
POLICE, and JOSEPH KRESCH, PRESIDENT,)
METROPOLITAN ALLIANCEOF POLICE,)
CHAPTER 267,)
Plaintiffs,)
v.) NO.: 18 cv 002468
NORTHEAST ILLINOIS REGIONAL) THE HONORABLE JOHN F. KNESS
COMMUTER RAILROAD CORP.,)
JOSEPH PEREZ, in his individual and)
Official capacity,)
Defendants.)

DECLARATION IN SUPPORT OF ATTORNEYS FEES

The undersigned hereby states and declares, pursuant to 28 U.S.C. § 1746, that if called as a witness, I would competently testify as follows:

1. I am a licensed attorney in the State of Illinois and have been so licensed since 2013.
2. I am employed by Northeast Illinois Regional Commuter Railroad Corp., d/b/a Metra as an Attorney 2 in its Law Department. I am duly licensed to practice in the State of Illinois, with seven years of experience as a trial attorney.
3. The undersigned was assigned responsibility for litigating the above referenced case.
4. With respect to the above captioned case, the undersigned has diligently pursued obtaining answers to written discovery, including for purposes of this affidavit, preparation of the Motion to Compel heard by this Court on September 25, 2020. [Dkt. 88].
5. The undersigned has rendered 3.1 hours of services related to this matter, as set forth in Exhibit 1, resulting in a reasonable fee of \$697.50.

6. The staff members engaged in the preparation and filing of the motion to compel [Dkt. 88] are:

- Stephen G. Goins – Attorney 2 in Metra’s Law Department; licensed in 2013; 7 years of litigation experience; identified as SGG in the table attached as Ex. 1.
- Thomas Platt – Director of Metra’s Litigation Department; licensed in 1981; 39 years of litigation experience; identified as TP in Ex. 1.
- Pamela Post -- Senior Litigation Paralegal in Metra’s Law Department; 14 years of litigation experience; identified as PKP in Ex. 1.

7. The sum of the hours expended related to this matter is four hours. The reasonable fee is therefore \$835.

8. The time record attached as Exhibit 1 fairly and accurately state the time I spent working to bring the Motion to Compel [Dkt. 88].

9. The declaration of Thomas Platt is attached hereto as Exhibit 2.

10. The declaration of Pamela Post is attached hereto as Exhibit 3.

11. I hereby declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the foregoing is true and correct to the best of my personal knowledge, information, and belief.

October 2, 2020

Date

/s/ Stephen G. Goins

Stephen G. Goins